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REMARKS

Claims 1-27 are currently pending in the subject application and are presently under consideration. Favorable reconsideration of the subject patent application is respectfully requested in view of the comments herein.

Applicants' representative acknowledges with appreciation the Examiner's indication that claims 4, 8-13, 15-20, and 24-27 would be allowable if recast in independent form to recite all limitations of respective base claims and any intervening claims. However, it is believed such amendments are not necessary in view of the deficiencies discussed *infra* of the cited art *vis a vis* applicant's claimed invention.

Favorable reconsideration is requested in view of the comments below.

**I. Rejection of Claims 1-3, 5-7, 14 and 21-23 Under 35 U.S.C. §103(a)**

Claims 1-3, 5-7, 14 and 21-23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Tjandrasuwita, *et al.* (US patent 5,422,654) in view of Santilli (US patent 5,675,361). Reconsideration and allowance of these claims is respectfully requested for at least the following reasons. Neither Tjandrasuwita, *et al.* nor Santilli, alone or in combination, teach or suggest all the limitations as recited in the subject claims. Further, there is no motivation found within the cited references to combine such references.

To reject claims in an application under §103, an examiner must establish a *prima facie* case of obviousness. A *prima facie* case of obviousness is established by a showing of three basic criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. See MPEP §706.02(j). The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art and not based on applicant's disclosure. See *In re Vaeck*, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991).

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In particular, neither Tjandrasuwita, *et al.* nor Santilli teach or suggest *a hardware cursor that selectively overlays a cursor image across a display boundary onto... first and second display portions... of a dual scan display* as recited in claims 1, 5, and 21. As described in previous correspondence, the present invention as recited in these claims reduces computational overhead required in conventional dual scan display cursor systems, which employ software to position a cursor image (in contrast to hardware). Dual scan displays provide faster refresh rates when compared to conventional single scan displays. High-speed refresh rates are made possible *via* dividing a display region into two segments that are refreshed at a substantially similar time, wherein separate data paths, one corresponding to each display region, are employed. The present invention makes up for deficiencies associated with software cursors utilized in dual scan displays *via* providing a *hardware cursor that... overlays a cursor image across the display boundary* within a dual scan display (e.g., a top portion of the cursor image is overlaid in an upper segment of the dual scan display and a bottom portion of the cursor image is *concurrently overlaid* in a lower segment of the dual scan display).

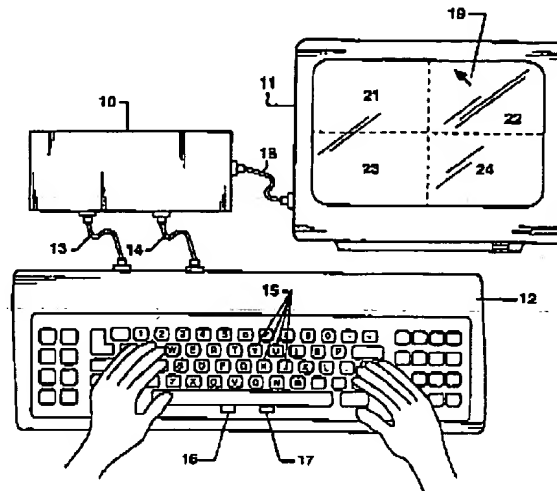
Tjandrasuwita, *et al.* teaches a system for converting a cathode ray tube (CRT) data stream to a dual panel display data stream. The system taught in Tjandrasuwita, *et al.* allows an increased number of gray level patterns to be provided, thus enabling displays to be associated with higher resolution and improved image quality. The Examiner concedes that Tjandrasuwita, *et al.* does not disclose a *hardware cursor* as recited in the subject claims – “Tjandrasuwita et al. do not disclose a hardware cursor that selectively overlays a cursor image across the display boundary onto at least one of the first and second display, and first and second data paths respectively associated with the first and second display portions.” Accordingly, the Examiner cites Santilli to make up for the aforementioned deficiencies.

The Examiner incorrectly contends that Figure 1 of Santilli, which is reproduced below for clarification, discloses a *hardware cursor* that selectively overlays a *cursor image across a boundary between first and second display portions of a dual scan display*. Santilli, however, nowhere discloses that the display is a *dual scan display*, and further does not disclose, teach, or suggest that cursor (19) is a *hardware cursor*.

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FIGURE 1



Santilli, with respect to the above figure, discloses that a block of keys (15) can include position sensors, and a cursor (19) is moveable with respect to sensed positions of fingers on the keys. Furthermore, Santilli teaches that a display (11) can be partitioned into four quadrants (21), (22), (23), and (24), wherein a particular key in the block of keys (15) is assigned to each quadrant to facilitate movement of the cursor (19). For example, Santilli teaches that "Y", "U", "H", and "J" keys on a keyboard (12) can include position sensors, wherein sensed movement of a finger on the "Y" key controls movement of the cursor (19) in an upper-left quadrant (21) of the display (11), sensed movement of a finger on the "U" key controls movement of the cursor (19) in an upper-right quadrant (22) of the display (11), sensed movement of a finger on the "H" key controls movement of the cursor (19) in a lower-left quadrant (23) of the display (11), and sensed movement of a finger on the "J" key controls movement of the cursor (19) in a lower-right quadrant (24) of the display (11). Santilli, however, does not disclose, teach, or suggest that the display (11) is a *dual scan display*; rather, Santilli only discloses that the display (11) can be partitioned into quadrants to facilitate moving the cursor (19) without removing one's hands from the keyboard (12), and never mentions dual data streams that are employed for faster refresh rates in dual scan displays.

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Moreover, Santilli does not disclose that the cursor (19) is a *hardware cursor* as recited in the subject claims. In contrast, Santilli specifically discloses utilizing *software* for positioning the cursor image (19) at col. 10, lines 51-55, which is reproduced below.

... any type of software to aid pointing as is typically used with mice and other pointing devices can be used in conjunction with this invention. For example, some software lets the cursor "jump" to a function when the cursor is positioned close to it.

Accordingly, Santilli, like Tjandrasuwita, *et al.*, does not disclose, teach, or suggest a *hardware cursor that selectively overlays a cursor image across the display boundary onto the first and second display portions...* of a *dual scan display* as recited in independent claims 1, 5, and 21. In fact, Santilli neither teaches nor suggests a *hardware cursor* or a *dual scan display* as claimed.

As the teaching or suggestion to make the claimed combination must both be found in the cited references under *In re Vaack*, 947 F.2d 488 (Fed. Circuit, 1991), and neither Tjandrasuwita, *et al.* nor Santilli teach or suggest *means for concurrently overlaying a cursor image generated via the hardware cursor onto the first and second display portions*, it is readily apparent that the rejection of claims 1, 5, and 21 (and claims 2-3, 6-7, 14 and 22-23 which depend therefrom) should be withdrawn.

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CONCLUSION


The present application is believed to be in condition for allowance in view of the above comments and amendments. A prompt action to such end is earnestly solicited.

In the event any fees are due in connection with this document, the Commissioner is authorized to charge those fees to Deposit Account No. 50-1063.

Should the Examiner believe a telephone interview would be helpful to expedite favorable prosecution, the Examiner is invited to contact applicant's undersigned representative at the telephone number below.

Respectfully submitted,

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